

## **EXHIBIT 8**



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1 after a complaint was made. It could be incidental.

2 They could be removed for some other reason besides  
3 that.

4 Q. So if they were removed because of the  
5 complaint, though, then that's not a cover-up, in your  
6 opinion; is that correct?

7 MS. TESORIERO: Objection to form.

8 A. I think it depends on the particulars of  
9 the situation.

10 Q. Okay. Have you personally witnessed any  
11 sexual abuse within The Satanic Temple?

12 A. I have not.

13 Q. You gave an interview to Julia Duin at some  
14 point previously; is that correct?

15 A. That is correct.

16 Q. During that interview you indicated --  
17 well, let's back up. I believe during that interview  
18 you indicated that you were a witness to a sexual  
19 harassment complaint. Do you recall that?

20 A. That sounds correct, yes.

21 Q. And when I say "I believe," I'm not sure if  
22 it was you or if it was someone else. So unpacking it  
23 slightly, did you indicate to Julia Duin that you were  
24 a witness to a sexual harassment complaint?

25 A. I believe that is correct, yes.

1 Q. Okay. In your definition of sexual abuse,  
2 whatever the sexual harassment complaint was, was that  
3 sexual abuse?

4 A. I don't know that I feel qualified to say.

5 Q. Okay. Well, what was the sexual harassment  
6 complaint?

7 A. There was a former member of the local  
8 TST group who had been, from my understanding,  
9 repeatedly made to feel uncomfortable by a much older  
10 member. I think -- I think this was in a period of  
11 2017 to 2018. So it was before I was a member. They  
12 left because it was nonaddressed for months, and then  
13 I found out about it in 2020.

14 Q. Let's unpack that slightly. You indicated  
15 that you were a listed witness on a complaint;  
16 correct?

17 MR. ROLLER: Object to the form. I think  
18 it misstates prior testimony.

19 Q. Let me rephrase. You indicated to Duin  
20 that you were a listed witness on a sexual harassment  
21 complaint; correct?

22 A. I'm not -- I'm not sure. There was a  
23 complaint by a person who was no longer a member. We  
24 found out about it in 2020, and then that was brought  
25 up. That's when I was made aware of it.

1           A.       I do.

2           Q.       Thank you. With that definition in mind,  
3   you mentioned that in addition to the e-mail from  
4   Wylie Duffy, you had heard of other incidents of  
5   sexual abuse within The Satanic Temple. Could you  
6   briefly describe the incidents as you heard them?

7                   MR. KEZHAYA: Object to hearsay.

8           A.       I have seen other people talk about their  
9   experiences in TST. I guess the most significant one  
10   would be a member of what was then The Satanic Temple,  
11   Austin chapter, who claimed that they were sexually  
12   assaulted by a chapter head. And in response to this,  
13   the -- my understanding is that the chapter head and  
14   their partner, who was the leader of a Dallas group,  
15   created a doxing website to attack the person who  
16   talked about being sexually assaulted. That doxing  
17   website detailed the victim's sexual history. Tried  
18   to, as far as I can tell, mock them quite a bit,  
19   embarrass them, and tried to target their mother and  
20   one of their friends. That person in Austin who  
21   posted about it had public Facebook posts talking  
22   about their experience in the process of it, and the  
23   website targeting them, I believe, also is still up.

24                   TST has a holiday called Lupercalia. I  
25   believe it is in February. It's a celebration of

1     sexuality, supposedly. I know that the co-owner of  
2     TST, Doug Misicko, used to solicit nudes for that. I  
3     don't know how comfortable everyone was with those  
4     things, but I know that some people have talked about  
5     how Lupercalia made them feel uncomfortable.

6                     There was a person who talked about going  
7     to the --

8                     MR. KEZHAYA: Objection. This is well  
9     outside the scope of the protective order. This is  
10    very far askew. Knowledge connotes personal  
11    knowledge. We're not here to play internet detective.  
12    We're here in a lawsuit.

13                    MS. TESORIERO: Are you --

14                    MR. KEZHAYA: This is objection to hearsay,  
15    and I'm about to shut this thing down.

16                    MR. ROLLING: No. Hearsay is --

17                    MR. KEZHAYA: You-all got this protective  
18    order precluding me from getting anything outside of  
19    sexual abuse and cover-up. None of this is sexual  
20    abuse and cover-up. Knowledge. Personal knowledge.  
21    This is all hearsay. I object. Do you have any  
22    foundational witnesses to talk about any of the stuff  
23    that this guy is rattling off right now?

24                    MS. TESORIERO: I don't believe you have  
25    grounds to stop the deposition. I'm asking of his